

## **REMARKS/ARGUMENTS**

### **Claim Amendments**

The Applicant has amended claims 1, 22 and 36. Applicant respectfully submits no new matter has been added. Accordingly, claims 1-31 and 33-46 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### **Claim Rejections – 35 U.S.C. § 112**

Claims 1, 22, and 36 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter as the invention. Claims 1, 22 and 36 have been amended to correct the deficiencies as noted in the Detailed Action and the Applicants respectfully submit that claims 1, 22 and 36 are now allowable.

### **Claim Rejections – 35 U.S.C. § 103 (a)**

Claims 1-31 and 33-46 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lee (US 6,539,225B1) in view of Tiedemann, Jr. et al (US 5,870,427A) and C.E. Perkins et al "Route Optimization in mobile IP", draft-ietf-mobileip-optm-08.txt (Feb. 25, 1999). The Applicant respectfully traverses the rejection of these claims.

The Lee reference provides seamless handoff by requiring simultaneous bindings and by using bi-casting, i.e., duplicating the communication content received from the correspondent nodes (see column 5, lines 43 – 47).

The Applicant's present invention provides seamless handoff by synchronizing the nodes using either the DRR (De-Registration Reply) or (DBA) Deregistration Binding Acknowledgement and does not duplicate content. The main advantage over Lee is that the present invention is more efficient, since it does not require any additional (duplicated) network bandwidth during the disruption duration nor does the present invention require establishment and maintenance of simultaneous bindings. Moreover,

the transfer of the old care-of address data packets from the base station to the mobile node is synchronized.

In the Lee reference a seamless handoff is provided by duplicating (bi-casting) content and then sending one copy to the old sub-network router and sending the other content copy to the new sub-network router. Thus, in Lee, duplication (bi-casting) of content is necessary. The Lee reference duplicates communication content and maintains mobility bindings with the old Foreign Agent and a New Foreign Agent (col. 5, lines 40-47) making content available at the old BSS. As disclosed in the Lee reference, the "...multi-route tunneling preferably continues for as long as necessary to ensure that the handoff procedure has completed." (col. 5, line 67 – col. 6, line 2) Thus, Lee is maintaining two paths of data transfer in contrast to the Applicant's one path.

In the Applicant's invention, the seamless handoff is provided by just sending one content carried by old care-of address data packets (i.e., data packets that use as destination address the old care of address) and by synchronizing the nodes using either the (De-Registration Reply DRR) or Deregistration Binding Acknowledgement (DBA). Thus, the content is not duplicated, but is first sent to the old care-of address. If the mobile node does not receive the DRR or DBA before the wireless connectivity with the old sub-network router deteriorates badly, then the Mobile node instructs the old sub-network router to send all its stored old care of address data packets to the new sub-network router. In this way no additional (duplicated) network bandwidth during the disruption duration is required. Furthermore, the establishment and maintenance of simultaneous bindings is not required.

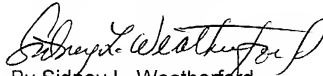
The Applicant submits that neither Lee nor Tiedemann nor Perkins, either individually or in combination, teach or suggest the limitations described above. This being the case, the Applicant respectfully requests withdrawal of the rejection of claims 1, 22 and 36 and the respective dependent claims.

**CONCLUSION**

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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